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FILED

JUN 28 2018 *Am*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JONATHAN MASON, a/k/a "Chip,"
KEVIN TWYMAN, KAREEM
MOONEY, a/k/a "Reno," DEON PUGH,
a/k/a "Big D," EDUARDO ANDERSON,
a/k/a "Doe," DERRICK WILTZ, a/k/a
"Do-Dirty," DENNIS MYERS, a/k/a
"Dino," RYAN PEARSON, ALVIN
WILLIAMS, MARTELL WHITE, a/k/a
"Rude Boy," and WILLIAM RUTLEDGE

Case No: 18 CR 157

Violations: Title 21, United States Code,
Sections 841(a)(1) and 846, and Title 18,
United States Code, Sections 2 and
922(g)

JUDGE LEE

MAGISTRATE JUDGE VALDEZ

COUNT ONE

The SPECIAL FEBRUARY 2017 GRAND JURY charges:

1. Beginning no later than in or about September 2017, and continuing to
in or about March 2018, at Chicago, in the Northern District of Illinois, Eastern
Division,

JONATHAN MASON,
KEVIN TWYMAN,
KAREEM MOONEY,
DEON PUGH,
EDUARDO ANDERSON,
DERRICK WILTZ,
DENNIS MYERS,
RYAN PEARSON,
ALVIN WILLIAMS, and
MARTELL WHITE

defendants herein, did conspire with each other and with others known and unknown
to knowingly and intentionally possess with intent to distribute and distribute a

controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; a quantity of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-1 [1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance; a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846; and

2. With respect to JONATHAN MASON, also known as “Chip,” KEVIN TWYMAN, KAREEM MOONEY, also known as “Reno,” DEON PUGH, also known as “Big D,” DERRICK WILTZ, also known as “Do-Dirty,” DENNIS MYERS, also known as “Dino,” and RYAN PEARSON, the offense involved 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-1 [1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

3. With respect to EDUARDO ANDERSON, also known as “Doe,” the offense involved 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance; and

4. With respect to ALVIN WILLIAMS, the offense involved 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance.

COUNT TWO

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about September 14, 2017, at Chicago, in the Northern District of Illinois, Eastern Division,

JONATHAN MASON,
EDUARDO ANDERSON,
and DERRICK WILTZ,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about October 18, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

JONATHAN MASON and
DERRICK WILTZ,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a 100 grams or more of a mixture and substance containing a detectable
amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,
United States Code, Section 2.

COUNT FOUR

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about November 22, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

JONATHAN MASON,
EDUARDO ANDERSON, and
DENNIS MYERS,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, 100 grams or more of a mixture and substance containing a detectable
amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,
United States Code, Section 2.

COUNT FIVE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about December 6, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

JONATHAN MASON and
KEVIN TWYMAN,

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-1 [1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance; and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SIX

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 7, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

KAREEM MOONEY,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 7, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

DEON PUGH and
DERRICK WILTZ,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity a mixture and substance containing a detectable amount of
heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18,
United States Code, Section 2.

COUNT EIGHT

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 21, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

MARTELL WHITE,

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, a quantity a mixture and substance containing a
detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 23, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

ALVIN WILLIAMS,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

JONATHAN MASON,
DEON PUGH, and
RYAN PEARSON,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity of a mixture and substance containing a detectable amount of
cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,
United States Code, Section 2.

COUNT ELEVEN

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about February 26, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

WILLIAM RUTLEDGE,

defendant herein, did knowingly and intentionally possess with intent distribute a
controlled substance, namely, a quantity of a mixture and substance containing a
detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

The SPECIAL FEBRUARY 2017 GRAND JURY further charges:

On or about March 14, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

DEON PUGH,

defendant herein, having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a loaded SCCY, model CPX-29mm caliber semi-automatic pistol, bearing serial number 116092, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2017 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841, 843, and 846, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a).

2. The property to be forfeited includes, but is not limited to:

a. the following specific property:

- i. a Smith and Wesson .357 Magnum revolver, model 686-6, bearing serial number CEZ9127;
- ii. a Cobra Enterprise of Utah, Inc. semi-automatic pistol, model FS380, bearing serial number FS091635;
- iii. a loaded HiPoint semi-automatic pistol and magazine containing 8 rounds, model JHP .45 ACP, bearing serial number X4250620;
- iv. a loaded Smith and Wesson 9mm semi-automatic pistol and magazine containing 4 rounds, model M& P Shield, bearing serial number HXB6635;
- v. a silver Ruger .357 caliber revolver, model SP101, bearing serial number 57549809;
- vi. approximately 200 rounds of ammunition seized by law enforcement on March 14, 2018 from a residence on the 6400 block of S. Martin Luther King Drive in Chicago, Illinois;

- vii. a loaded SCCY 9mm semi-automatic pistol, model CPX-2, bearing serial number 116092;
- viii. a Sekins .223 caliber precision rifle, model SBA15, bearing serial number 12332;
- ix. a loaded magazine, PMAC 30, 5.56x25 EN 312-000 with 19 .223 caliber rounds;
- x. a black 2013 Audi, bearing VIN number WAURGAFDXDN015730;
- xi. \$405 seized by law enforcement on May 1, 2018, from RUTLEDGE;
- xii. \$1,350 seized by law enforcement on February 26, 2018, from RUTLEDGE;
- xiii. \$2,926 seized by law enforcement on March 14, 2018, from WILLIAMS;
- xiv. \$4,619 seized by law enforcement on March 14, 2018, from PUGH.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY